

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: CHRISTOPHER GERALD RAAB AKA CHRISTOPHER G. RAAB AKA CHRISTOPHER RAAB  DEBTORS</b>	<b>BANKRUPTCY NO. 18-17382  CHAPTER 13</b>
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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Debtor, Christopher Gerald Raab aka Christopher G. Raab aka Christopher Raab, has filed a Motion to Avoid Lien of VIST Bank Formerly Known as Leesport Bank Pursuant to 11 U.S.C. § 522(f) in the above-captioned matter.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before January 21, 2019 **you or your attorney must file a response to the Motion.** (*see Instructions on next page*).

3. A hearing on the Motion is scheduled to be held **on February 7, 2019 at 9:30 a.m. before the Honorable Richard E. Fehling, United States Bankruptcy Court, The Madison Building, 400 Washington Street, Reading, PA 19601.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.

4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's office at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at

United States Bankruptcy Court  
The Madison Building  
400 Washington Street  
Suite 301  
Reading, PA 19601

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Shawn J. Lau, Esquire  
Lau & Associates, P.C.  
4228 St. Lawrence Avenue  
Reading, PA 19606  
610-370-2000 Phone  
610-370-0700 Fax  
Shawn\_lau@msn.com

Dated: January 7, 2019

/s/**Shawn J. Lau**  
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